

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF NORTH CAROLINA**

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MARCIE FISHER-BORNE, <i>et al.</i> ,	:	
Plaintiffs,	:	
v.	:	
JOHN W. SMITH, <i>et al.</i> ,	:	CIVIL ACTION NO. 1:12-cv-00589
Defendants.	:	
	:	
	:	
	:	
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ELLEN W. GERBER, <i>et al.</i> ,	:	
Plaintiffs,	:	
v.	:	
ROY COOPER, <i>et al.</i> ,	:	CIVIL ACTION NO. 1:14-cv-00299
Defendants.	:	
	:	
	:	
	:	
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PLAINTIFFS' MOTION FOR ATTORNEYS' FEES UNDER 42 U.S.C. § 1988

Pursuant to Federal Rule of Civil Procedure 54, Plaintiffs, by and through undersigned counsel, respectfully move the Court for an award of attorneys' fees and non-taxable costs incurred in successfully prosecuting the above captioned cases. As set forth more fully in the Memorandum in Support of Plaintiffs' Motion and attached exhibits, filed herewith, Plaintiffs request fees in the amount of \$311,196.20 and non-taxable costs in the amount of \$6,612.20.¹

¹ In accordance with Local Rule 54.2, Plaintiffs consulted with counsel for the North Carolina Department of Justice and counsel for Thom Tillis, then-Speaker of the North Carolina House of Representatives, and Phil Berger, President Pro Tempore of the North Carolina Senate. As of the date of this motion, the parties have been unable to reach an agreement in regard to the fee award. A statement of consultation is attached to Plaintiffs' Memorandum in Support of Plaintiffs' Motion for Attorney Fees as Exhibit A.

This the 13th day of October 2015.

Of Counsel:

/s/ Amy E. Richardson

Rose A. Saxe
James D. Esseks
American Civil Liberties Union
Foundation
125 Broad Street
New York, New York 10004-2400
Telephone: (212) 549-2500
Facsimile: (212) 549-2646
rsaxe@aclu.org
jesseks@aclu.org

Amy E. Richardson
N.C. State Bar No. 28768
Patrick P. O'Donnell
Harris, Wiltshire & Grannis LLP
2009 Fairview Road
#6220
Raleigh, NC 27628
Telephone: (919) 429-7386
Facsimile: (202) 730-1301
arichardson@harriswiltshire.com

Elizabeth O. Gill
American Civil Liberties Union
Foundation
39 Drumm Street
San Francisco, California 94111-4805
Telephone: (415) 343-1237
Facsimile: (415) 255-1478
egill@aclunc.org

Jonathan D. Sasser
N.C. State Bar No. 10028
Jeremy M. Falcone
N.C. State Bar No. 36182
P.O. Box 33550
Raleigh, North Carolina 27636
Telephone Number: (919) 865-7000
Facsimile Number: (919) 865-7010
jsasser@aclunc.org
jfalcone@aclunc.org

Christopher Brook
N.C. State Bar No. 33838
ACLU of North Carolina
P.O. Box 28004
Raleigh, North Carolina 27611-8004
Telephone: (919) 834-3466
Facsimile: (866) 511-1344
cbrook@acluofnc.org

Garrard R. Beeney
David A. Castleman
C. Megan Bradley
William R.A. Kleysteuber
SULLIVAN & CROMWELL LLP
125 Broad Street
New York, New York 10004-2498
Telephone: (212) 558-4000
Facsimile: (212) 558-3588
beeneyg@sullcrom.com
castlemand@sullcrom.com
bradleyc@sullcrom.com
kleysteuberr@sullcrom.com

Attorneys for the Plaintiffs

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing has been filed electronically with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

This the 13th day of October, 2015.

HARRIS WILTSHIRE & GRANNIS LLP

/s/ Amy E. Richardson

Amy E. Richardson

N.C. State Bar No. 28768

2009 Fairview Rd. #6220

Raleigh, NC 27628

Telephone Number: (919) 429-7386

Facsimile: (202) 730-1301

amy.richardson@harriswiltshire.com

Attorney for Plaintiffs